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With assistance from Howard Chrest retired area wildlife management biologist 1_/
Draft No. 3 Final draft will go to FWP comment address before the deadline.

Comments on Grizzly Bear Management Plan for Southwestern Montana, 2013
Draft Programmatic Environmental Impact Statement Prepared by Montana Fish,
Wildlife and Parks August 2013 74 pp.

Montana Fish, Wildlife and Parks
SW MT Grizzly EIS
PO Box 200701
Helena, MT 59620

We have closely followed grizzly bear management and research in Montana for 50 years. There are some major problems with how this EIS has been handled, with the information contained and the extremely limited time allowed for written comment. The comment period should be extended for at least 60 days more past the Sept. 16 deadline. Instead of just one open house in the comment area in Bozeman and open houses in the urban areas of Helena and Billings, major efforts should be made to reach out to communities where the bears are on the ground or where FWP proposes to force new distribution. Most people do not keep up to date on grizzly bears, and secrecy by the FWP has not improved the situation. I find it easier to get better grizzly information from Wyoming and they know I live in Montana.

Our comments are detailed by page number and heading. On the cover page no length of time is listed for which this plan is effective other than 2013. We do not believe FWP can be trusted to write detailed annual updates when we look at your infrequent reporting on other species.

Page 4 Acknowledgements-- Assistant should be changed to assistance.

Page 4 Process for plan development says a broad scoping process was carried out from 2000 to 2002. It says the Dept. is scoping all the time so no new scoping was needed for the EIS. I have not seen that continual scoping process occurring for grizzly bears in Region 3 and I have lived in the Region since 1986.

The process for plan development in 2002-2012 says all comments were used to assist in preparing the final plan. I have closely read the 2002 plan many times and while there was listing of the comment subjects. It is unknown if it was complete. Most of the comments listed appeared to come from environmental groups. There was no breakdown of comments by resident and non-resident status, no breakdown of comments by instate and out of state groups and no breakdown of comments by various government agencies. We believe the Dept. probably relied most heavily on

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comments by environmental groups and their out of state members. A Freedom of Information Act Request in 2004 to review the comments was refused by Director Jeff Hagener. See the comprehensive and detailed public efforts by Wyoming Game and Fish Dept. in their two 2005 reports on grizzly bear occupancy of Wyoming land.

Page 5 PCA and 10 mile buffer zone is a "core" area for grizzly bears. Later you seem to expand to more core areas on page 31.

Fig. 1 page 6 No detailed specific boundaries are given on the small scale map for the Conservation Management Area (term not defined) and it appears the boundary follows Interstate 15 rather than the boundary between Montana and Idaho. Also the boundaries of the core area and the demographic areas are not carefully defined nor are the meanings and implications of the terms listed.

Page 7 Demographic monitoring area—population and mortality counted. Grizzly bear population and mortality outside that area not counted. Probably people should read this as "FWP desires no limits on grizzly bear population outside the counting area."

Page 8 "For the purpose of this plan, the GYA is defined very broadly for southwestern Montana to include lands that may be accessed by grizzly bears in the near future." This statement should be eliminated from the report. It is meaningless, too broad and not realistic. As pointed out on page 9 FWP coordinates with federal agencies...but has no legal jurisdiction over how those lands are managed".

Page 8-- Grizzly occupancy outside the demographic area would not be actively discouraged. There would have to be a conflict before they could be removed. Grizzly bears are grizzly bears. It is almost a 100 per cent certainty there will be conflicts especially on private land. Wyoming's idea to keep grizzly bears off private land and low elevation BLM land to avoid conflicts is a better idea. I communicated personally with the head conflict specialist Mark Bruscano, Wyoming Game and Fish Dept. in Cody, WY. He told me he has had no problems proactively managing grizzly bears which would likely cause conflicts on private land. He gave examples of how and why he removes grizzlies from localities they are likely to cause problems.

Page 8 "A great deal is unknown about how grizzly bears will respond to available habitat." People should be aware that grizzly bears will not stay in the small isolated mountain ranges but will soon appear along the creeks and rivers in the valleys and cause problems for livestock operations, land owners, subdivisions, towns, anglers, hunters, campers and others on the mostly private land there. Montana's non-intervention policy to force grizzly bears on private land is probably a taking of private property.

Page 10- It is obvious that the downward trend in bear numbers was reversed without the need or support of private lands regulation. Ref. March 2007 "USFWS announced recovery".

Page 10 Recent Litigation History List the plaintiffs and defendants so people will know who is causing problems and with whom the FWP is schmoozing. Refer to page 67 for names of the latter groups. They had their plan input half-way through the plan development but other Montana groups and individuals did not enjoy that access.

Page 11—MCA 87-5-301 The findings clearly set the policy for grizzly bear management..."avoid conflicts with humans and livestock and proactively control grizzly bear distribution and prevent conflicts..." FWP should not ignore this legislative action.

Page 12 Suitable grizzly habitats are not defined accurately or mapped. It says not all portions of the seven counties are suitable grizzly bear habitat. Describe and map the boundaries and tell us what constitutes unsuitable habitat in this inadequate EIS.

Page 14 List the number of private acres of land by county and also the percentage breakdown of the various land ownership of federal, private and state lands by county. Forcing the aggressive, dangerous and highly predaceous Yellowstone grizzly bears onto private land is almost certainly a taking of that private property.

Pages 18 and 19—Studies show that when grizzly bears lack an adequate food supply on public lands conflicts often occur on private lands. Because the YES bears are trying to live in dry habitats with relatively less plant foods (berries) than are NCDE bears they must forage over larger areas and have bigger home ranges. FWP has not stated that most of the high elevation whitebark pines have died in southwest MT. Grizzly numbers should be balanced with the wild food supply available on public lands.

Page 25 Population Monitoring last bullet point-- No description is given on how social tolerance will be defined or measured. See Wyoming information on this in earlier mentioned reports and how desired grizzly occupancy of land was determined.

Page 27 Fig 3 gives mortality limits per year as 9 per cent for females 2+ years old, 9 per cent for yearlings and cubs, and 15 per cent for males 2+ years old.

Page 30 in Table 6 Nine grizzly mortalities from 1992-2001 were from self-defense and mistaken identity while hunting black bears. The two categories should not be lumped.

Table 7 shows 12 grizzly bear mortalities 2002-2012 due to the lumped categories above.

Page 30 "Often there are human injuries in defense of life and property mortalities (ie grizzly bear mortality). Do not give us inaccurate FWP and federal government speculation. Tell us exactly how many DLP shootings of grizzly bears resulted in mauling of people. I know of three cases where people shot grizzly bears in defense of life after people were mauled or as the fight was occurring. One was Nash, an YNP employee hunting black bears when attacked by a grizzly, and one was Ben Johnson an elk hunting guide who was mauled along with his woman client. The 3rd occurred in WY when a father shot a running, 500 pound, male grizzly chasing his son and then

smashed the bear over the head with his compound bow. The wounded bear left the son on the ground and died a short distance away from the heart shot. I am tired of hearing women from the Beaverhead-Deerlodge Forest in Ennis tell people, "Never ever shoot a bear because you will be mauled 100 per cent of the time." While you are checking these numbers find out how many hunters used bear spray and it failed and they were forced to kill the bears-again I know of two cases. Collect some accurate statistics on the use of bear spray in southwest MT and the use of firearms to scare or kill grizzly bears. In those shootings find out and report the caliber of weapons that were used in each case. I am aware of one woman in the plan area who killed a grizzly with a .22 long rifle bullet as it was chasing her saddle horse in a corral. She got a hefty fine and probably should have gotten a medal. She was not injured nor was the horse.

Page 30--Since 2007 20 people in southwest Montana have received minor to severe injuries from grizzly bears (one fatality in those). Add that to the 11 grizzly bears shot in self-defense during that time and you have 31 very dangerous conflicts. Why are you trying to push grizzly bears widely to private lands where there are many people and where you will create many more conflicts? I am aware that more than 100 people have been mauled by grizzly bears in the YES area of WY, MT and ID since 1992 with some human fatalities. Since 1998 more than 100 grizzly bears have been shot in self-defense and most of the shooters were not mauled. Provide us with accurate data on how many shooters were mauled.

Page 31 Habitat/Habitat Monitoring/Human use of bear habitat

When will FWP start working with community groups to protect humans and private property from grizzly bears? Again it is very unclear how you plan to limit the distribution of grizzly bears and prevent conflicts as Montana state law requires. See the experience and policies in WY for keeping biologically unsuitable and socially unacceptable habitat mostly grizzly free. As far as I can see, Montana has done very little to define biologically suitable habitat and that which is socially unacceptable even though that was proposed to be done about 13 years ago.

You state FWP will work with citizen groups to maintain "core areas". It sounds like you are planning to add core areas besides the one described on page 5. Tell us where those are and give us accurate details. Provide information on the need for them.

Page 33 Intermountain valleys are private land and will provide opportunities for grizzly bears to travel between mountain ranges. Common sense should indicate there will be major problems when that is attempted. That concept will result in huge fights and conflicts over private property rights and the travel actions of aggressive, dangerous and predaceous bears. With one bear specialist and several wardens with an "attitude" FWP will become even less popular when the problems and conflicts increase as you are predicting for areas with more people and livestock.

Page 33 Habitat Availability and Security

You write about Recommendations for Subdivision Development: A Working Document MFWP 2012. Let me give you our experience with that in Madison County this past year. The local county planner showed up at a Governor's meeting in Seattle praising the FWP GIS plan. The former County Planner working from Madison County helped FWP with the 2012 plan and is now retired again. The current planner in an update of the Madison County Plan made maps which show most of the mountain ranges in Madison County as "core" grizzly bear habitat, even though no grizzly bears are present in some and the one remaining BLM range was listed as a grizzly bear travel corridor in its entirety. Grizzly bear and wolverine travel corridors were determined by a radical contractor who has been very active in the Y2Y movement and who has opposed delisting of grizzly bears. The county work was paid for with a state and federal grant which was supposed to be used to benefit low income people. Grizzly bear/wolverine travel corridors were shown on much irrigated land, were forced through eight towns, and a several mile wide strip of private productive rangeland next to all mountain ranges was designated as grizzly/wolverine travel corridors. There is more if you are interested. With county employees like that we do not need enemies. FWP employees in Region 3 and Helena told me the data used came from the contractor not FWP.

Page 35 "Incorporating the grizzly bear into ongoing programs for all wildlife is a more productive approach than moving restrictions outside the primary conservation area". When FWP attempts to manage grizzly bears like elk, mule deer and moose are managed, that may mean very little grizzly management. Those ungulate species have major problems in SW Montana and grizzly bears and other predators are part of those problems in some locations. Timely and wise decisions are important in wildlife management. FWP sometimes takes years to make simple changes in programs or personnel.

Page 36 Climate change—This is not proven science or fact and we may have stabilization in the climate cycle during the last several years and be heading for a cooler period. FWP comments are typical of those believing they should never waste a crisis. Don't waste time on something like climate that you cannot influence. Your first sentence says, Climate change will probably not threaten grizzly bears. Then you dived off the deep end at the end of the discussion and said connected populations of grizzly bears without genetic erosion are the best way to mitigate climate change. There are no current genetic problems with Yellowstone grizzly bears. Possible problems decades in the future can easily be solved with grizzly bears trans-located from GNP to YNP. To be safe start the moving process next year. Move two male grizzly bears from GNP to YNP every 10 years. That will cut out the supposed need for grizzly bears to walk from GNP to YNP and eliminate lots of problems on millions of acres of land between those two parks.

Page 37 Preferred management approaches-- Make sure that human safety and lack of social tolerance for grizzly bears on private lands take precedence on private lands when decisions are made on grizzly bear numbers and distribution. That will help in a major way to prevent conflicts harming people and property.

Page 38 You continue to beat the drum for forcing grizzly bears into high conflict areas on millions of acres between Glacier National Park and Yellowstone National Park to move genes. Tell us the cost of trapping and moving two male grizzly bears from GNP every 10 years. You quote two papers by M.F. Proctor in Canada and Alaska and Northern US border gene flow but do not quote the original paper on genes in the grizzly bears of the YES area by Craig R. Miller and Lisette P. Waits, University of Idaho, The history of effective population size and genetic diversity in the Yellowstone grizzly (*Ursus arctos*): Implications conservation 4334-4339, PNAS, April 1, 2003, Vol. 100, No.7. They found no problem for several decades with 400 grizzlies in the population (now 716 bears). They also said that moving two grizzlies every 10 years to the Yellowstone area that breed would solve any gene problem in the Yellowstone area. They were not pushing Y2Y linkage, Wildlands Project or Agenda 21. Proctor was involved in climate change theories and ideas on international control of the grizzly bears.

You state that FWP will continue to work with private landowners on programs that provide access for wildlife. Perhaps that should read--- more grizzly bears on private land creating many problems.

You say you will make specific efforts to maintain grizzly presence in areas outside the PCA such as getting them into the Tobacco Root and Highland Mountains which would help to maintain genetic linkage. Let's forget about Agenda 21, Wildlands Project, Y2Y and just trap and move a couple of male grizzlies on a regular basis. You tell us nothing about those two small relatively dry mountain ranges or the many problems grizzlies will cause in the valleys. For example you do not mention the thousands of wintering cattle, subdivisions full of homes, several small towns, the city of Butte, many hunters, anglers, recreationists and campers, plains buffalo berry patches close to towns and other conflicts. You do not mention the deficiency in grizzly bear foods in these mountains or the many dead whitebark pine trees and aspen patches.

Fig. 4 page 39 The boundaries on the small map are not well described and most people will have trouble determining the locations. Conservation Management Area is not defined and it appears the western boundary follows Interstate 15 rather than the Montana-Idaho boundary.

Page 40 Fig. 5 shows that WY has had a much greater expansion of females and COY to the south than Montana has had to the north. They have also had much greater conflict problems including depredation on hundreds of livestock in WY. We on the other hand have been more fortunate in Montana with fewer grizzlies to cause conflicts. Grizzly population expansion on habitat increased 36 per cent in the YES in 2002 to 2012 and 34 per cent from 1980 to 1990.

Page 41 Bears found outside of the original recovery area often receive less consideration for capture and relocation after killing livestock, becoming habituated to humans, and becoming food habituated. That policy makes sense. At the same time, a

grizzly found far outside the original recovery area is left alone by managers when exhibiting natural, socially acceptable behaviors. Don't try to tell us you are monitoring the latter grizzlies 24 hours per day and know what they are doing at all times. FWP should have more courage on the removal of these grizzly bears far from suitable habitat. Wyoming has removed grizzlies in similar situations without having to wait for the bear to be involved in a conflict.

Page 41-- It is expected that grizzly bear expansion will continue. FWP plans to manage the bear so that it has consistent future expansion with the approach used for most other FWP species. For many species currently there is little or poor management. See the current public opinion of FWP throughout Montana. The dangerous and powerful grizzly bears have to be managed to protect people, private property, businesses, and other wildlife species which are prey for the bears and also to protect livestock. In the past five decades we have learned that grizzly bears require more management than ungulates. See our state law on proactive management of grizzly bear distribution and conflicts.

Page 43 FWP should get off the genetic expansion, by migrating grizzly bears band wagon and start doing better management on current grizzly populations. Montana citizens are not going to let you over-run all the private land with grizzly bears. I have yet to see a full and detailed annual conflict report on problems caused by grizzly bears even though that was promised by FWP in 2006 in the Western Montana Grizzly Bear Plan. The FWP web information on grizzly bear re-locations doesn't provide reliable and worth-while information to the public. The person in charge of grizzly bear conflicts and one of the authors of this plan told me she could not provide the public accurate and complete details on grizzly bear conflicts. Her reasoning was that people might get mistaken impressions of grizzly bears. I think that most Montana natives would disagree with that thinking. Truth and detailed information would be a better policy for conflicts with grizzly bears. FWP seems to think that sending out community organizers to the local folks will allow them to have grizzlies filling all the land. That is not true by a long shot. People are fed up with large predators causing problems. They are also fed up with inefficient, oppressive and expensive state and federal government. A 2010 survey by the USFWS showed that state and federal agencies were spending \$6,294.00 per grizzly bear per year. Alaska was not included in the tally.

Page 44 FWP expects human/grizzly bear conflicts will increase as bears expand into areas where people are living, working and recreating. If FWP employees had to donate part of their paycheck to people mauled or to families of people killed the management might change. If all the people involved in grizzly bear management had the opportunity to listen to people involved in attacks by grizzly bears and their lives after the attacks, we would see improved management especially if the media was present at those meetings. Instead FWP will be calling for more employees and money to handle the problems they have created by allowing grizzlies to expand to biologically unsuitable and socially unacceptable habitat.

Page 50 FWP says confrontation conflicts are nearly impossible to alleviate due to the randomness of the location and timing of occurrences. This is another good reason to limit grizzly bear numbers and distribution.

In recent years most of the livestock depredations in southwest Montana are occurring on private lands beyond the monitoring area and beyond the USFWS suitable habitat line. Where are the boundaries of the federal line? We saw no map showing it.

Many of these areas are marginal habitat leaving immigrant grizzlies with few high quality food sources. There is little that can be done to minimize livestock predation on open rangeland so management actions often invite capture and relocation or lethal removal of the depredating bears. Again this is strong argument for control of grizzly bear population size and distribution. Show us a map of the areas lacking grizzly bear foods and which are biologically and socially unacceptable for grizzly bears.

Page 55 Hunting-- Grizzly bear hunters should not be required to save and eat the meat because the bears are often infected with trichinella and ascarids. Depending on what the bears have been eating the meat may be highly unpalatable. Wyoming and Idaho do not require the saving of meat from any bears and Montana would have better bear management if that was not required also. Let people eat the meat if they want and at their own risk. That could also head off future lawsuits by people whose health is harmed by bear parasites. The reason people were forced to save bear meat was that the Dept. got weak kneed and was afraid anti-hunting people would shut down black bear seasons if the meat was not eaten. That has not occurred in Idaho and Wyoming. It is amazing what can be accomplished with strong fortitude. More bear hunters would hunt if they were not required to keep the meat.

Page 56 Montana hunters are prohibited from wasting meat unless they can prove it shows evidence of Trichinella.

FWP should obey state law 87-5-301 (b) Use proactive management to control grizzly distribution and prevent conflicts, including trapping and lethal measures to accomplish that. Pages 40-50 of the plan indicate FWP has no plans to limit grizzly bear distribution and numbers. Perhaps all FWP personnel breaking the law should be hauled into court and penalized for the lack of protection of people and private property in Montana.

FWP also appears to be ignoring the legislation in 1999 on keeping grizzly bears out of the Selway-Bitterroot area, Idaho legislation on that in 1997 and Governor Dirk Hemphorne's lawsuit on transplanting grizzly bears to that area. Please re-think forcing high grizzly bears numbers on southwest Montana so they will walk to the Selway-Bitterroot.

Page 57 Enforcement-- FWP personnel have no authority to enforce federal food storage regulations on federal lands. Game wardens should be kept out of that mess. Many of the federal food storage regulations in southwest Montana are very poorly conceived and are mostly about forcing their power on the people. People can go to jail

for six months and/or get a \$5,000.00 fine for being more than 100 feet from their vehicle and not having the windows completely rolled up on a hot day if food and/or beverages are present. Ditto that distance when cooking food and you must be looking directly at the food at all times. Personally if a large grizzly shows up and charges my food he is going to get it and I will be protecting myself or family. Ditto for having food and beverages in a tent after sundown; if you are not eating it, preparing it or preparing to store it on a high pole or in a hard sided vehicle. Ditto for persons having an empty pop or beer can in the bed of their pickup truck. There are 4 pages of these regulations in southwest Montana.

People had no opportunity to comment when the poor regulations were imposed on the Beaverhead/Deerlodge National Forest. The Ranger imposing them told a meeting of the Skyline Sportsmen in Butte that I attended that he was not required to have public comment on grizzly bear management. There has been no scientific research on most of the food storage regulations showing their need and efficiency. The public has not been informed of all the fines and/or jail sentences imposed by the USFS in southwest Montana.

In northern Montana camps on forest service lands grizzly bears are trained to stay out of camps by persons who guard the camp at all times. It is okay to have food in tents and carcasses of animals on the ground. In southern Montana you are penalized if you have any part of a wild or domestic animal, bird or fish on the ground within ½ mile of any camp used for sleeping in the past whether occupied or not. We are not sure how tipi rings fit into the penalty imposed.

Page 63 FWP apparently doesn't recognize the thresholds for social tolerance of grizzly bears. Wyoming Game and Fish Dept. completed a comprehensive public process to determine lands that were biologically suitable and socially acceptable for grizzly bears by 2005. Montana on the other hand has not defined biologically suitable or socially acceptable grizzly habitat. That mandate came from the Governor's Round Table meetings in the Racicot administration. FWP probably believes avoiding that mapping effort will help them distribute grizzly bears everywhere except in towns with more than 129 people per square mile and give them more power over people.

Page 65 FWP apparently believes they can force grizzly bears everywhere till people gain enough strength to require them to remove grizzlies due to safety concerns. FWP proactive management of grizzly distribution and numbers would appear to be a more common sense approach and follow state law.

Page 65 Define accurately with data your view that positive economic benefits will accrue to Montana with continually expanding grizzly bear populations. Don't speculate on those benefits. Tell us the economic impact to outfitting, livestock ranching, forestry harvests, roads, former safe use of rivers and creeks and lands, impact on private property sales and sale prices, and economic impact on homes, schools, waste disposal systems and people mauled by grizzly bears. Give us accurate data rather than pie in the sky rhetoric.

In the costs column you make no estimates of the costs to the public of elk and moose killed by grizzly bears and the impacts on those populations. Tell people about the Gallatin and Yellowstone elk declines and moose declines in some areas of southwest Montana and Yellowstone National Park.

Page 66-- You say the few human deaths and injuries due to grizzly bears (20 in southwest Montana since 2007) and many more in Wyoming and Idaho demonstrates the low level of risk. That low risk is not true in areas of high grizzly density and where people are traveling without vehicles. In those areas grizzly bears are a constant threat every day they are out of hibernation. I suspect the lead author of this paper has never been charged by one or more grizzly bears nor probably has the Montana representative on the Interagency Grizzly Bear Committee.

Page 66-- FWP says grizzly livestock depredations have been minimal in southwestern Montana with an average of five depredations per year 2002-2012 but they will increase with more bears more widely distributed. Does one animal equal a depredation or is that one incident with a number of animals in some cases? Ranchers on the upper Ruby River lost 80 calves and 22 cows to mostly grizzly bears and wolves in 2010. Prior to the high numbers of grizzlies and wolves their summer loss on the USFS allotment was about 30 cattle per year. One ranch manager on the Madison River told me that they lost several cattle to grizzlies each year but did not report them for fear of adverse action the forest service would take against their allotment.

Page 66 says any future expansion of grizzly bear populations may impact land management, agency travel plans, and agency projects. That expansion may also impact land use decisions by county officials. There are no details on what might be involved. There are no predictions on how private property or people will be affected or the economic costs. Stress and loss of a safe living, working and recreating environment are high cost items for people which should be considered by FWP but have not been in this EIS.

Page 67 Members of the Center for Biological Diversity, Defenders of Wildlife, Endangered Species Coalition, Greater Yellowstone Coalition, Natural Resources Defense Council and the Sierra Club met with FWP midway through the plan development to provide input and suggestions. FWP apparently did not meet with livestock organizations, sportsmen organizations, recreation and tourist groups, private landowners, legislators, county commissioners, outfitters and guides, subdivisions, towns, oil and gas and mining industries, forestry industry and others living and working on the land in southwest Montana.

This inadequate EIS says no scoping was done, very poor economic and safety data were presented and the public only got 30 days to obtain the plan, read the plan and comment with written comment. Only the no action and FWP preferred action were presented. Only one open house was held in the plan area in Bozeman which was poorly attended and open houses were held outside the plan area in the cities of Billings

and Helena. Compare this with how Wyoming handled their many meetings and 75,542 comment statements to define grizzly bear occupancy of habitat in Wyoming by 2005. See Special Report Draft Grizzly Bear Occupancy Management Proposal Following Delisting as a Threatened Species April 2005 Wyoming Game and Fish Dept. 56 pp. Also look at Wyoming Grizzly Bear Occupancy Guidelines Wyoming Game and Fish Dept. July 15, 2005. 26 pp. Montana deserves better managers and report writers working on grizzly bear EIS plans. It appears FWP has tried to exclude people in the planning area from obtaining the plan and making comments through poor advertising and very limited comment period, no meetings in the area towns, refusal to take verbal comment and refusal to provide a town hall type meeting situation where people can ask questions and make comments. People are not interested in open houses with a few displays or meetings controlled by a FWP paid facilitator who guides the meeting to a desired FWP result. Some people would rather make verbal comments as opposed to written comments. The Labor Day holiday and openings of bird and archery seasons and ranchers working hard to harvest crops will further diminish comments in the 30 days. Other Montana grizzly bear plans in 2002 and 2006 had 90 day comment periods.

Page 68 The meaning and boundaries of the CMA (conservation management area) are not accurately described nor are the implications for the public. The western boundary appears to be on Interstate 15 and the western edges of Beaverhead and Madison Counties are left in limbo.

FWP needs to extend the comment period for another 60 days, make a major effort to hold meetings in communities with grizzly bears or where grizzly bears are planned in the planning area. Make those meetings open to verbal comment and questions as not all people are comfortable typing comments. Also widely advertise those meetings with newspaper, television and radio ads and posters in the towns with notice in plenty of time for people to make plans. Tell people on a weekly basis how they can obtain the plans. Set up meetings with legislators and county commissioners separate from public meetings as Wyoming did. Provide us a detailed analysis of comments as Wyoming did.

Finally have the courtesy to treat the tax paying and license buying citizens of this state with the same opportunities FWP provided radical environmental groups in the planning process. The FWP persons causing that problem should be publically named and held accountable. In the Montana on the 2002 plan 13 meetings were held and 172 people attended. The Plan had 7,300 people commenting but only 836 were from Montana. On the western Montana plan in 2006 11 public meetings were held and 168 people attended. A grand total of 114 people made written comments and 103 were from Montana. On that plan facilitated meetings were held in 2004 and 2005 to get ideas for the plan at Kalispell, Missoula and Great Falls. No data were given for attendance numbers or groups represented.

Wyoming had much better participation in their grizzly bear occupancy meetings. They held one meeting with all stakeholder organizations, legislators and county

commissioners invited. They held three special meetings with county commissioners. They held 11 public meetings with the public at which 1,043 people signed the attendance record. They got 17,542 written comments and 75,919 comment statements which were analyzed and results printed in their report. They had detailed data on commenter categories and differences in comments between those categories. They did a much better job in Wyoming.

Put me on the mailing list for the final plan and other notices you put out on the plan.



Allen Schallenberger

P.S. The final draft will be sent to the official FWP comment address whenever the comment period is known. Our comments may be revised until near the deadline.

c. Copies of my letter to the Governor requesting an extension in the comment period and this draft 3 comment are also going out to FWP Dept. and Commission, legislators, county commissioners, livestock organizations, sportsmen's associations and individuals

Literature Mentioned

Grizzly Bear Management Plan for Southwestern Montana 2013 Draft Programmatic Environmental Impact Statement August 2013 74 pp. FWP

Grizzly Bear Management Plan for Southwestern Montana 2002-2012 Final Programmatic Environmental Impact Statement Oct. 2002 115 pp. FWP

Grizzly Bear Management Plan for Western Montana Final Programmatic Environmental Impact Statement 2006-2016 Dec. 2006 163 pp. FWP

Special Report Draft Grizzly Bear Occupancy Management Proposal Following Delisting as a Threatened Species April 2005 Wyoming Game and Fish Dept. 56 pp.

Wyoming Grizzly Bear Occupancy Guidelines Wyoming Game and Fish Dept. July 15, 2005 26pp.

The History of Effective Population Size and Genetic Diversity in the Yellowstone Grizzly (*Ursus arctos*): Craig R. Miller and Lisette P. Waits. Implications for Conservation 4334-4339, PNAS, April 1, 2003, Vol. 100 No. 7

Food Storage Special Order Beaverhead/Deerlodge National Forest, Madison and Jefferson Ranger Districts 2004 D6/D7-031 September 10, 2004 by Thomas Reilly Forest Supervisor—4 pp including map

Food Special Order LCpp18 and HO501 Occupancy and Use Restrictions northern Continental Divide Ecosystem, Flathead, Lewis and Clark, Lolo and Helena National Forests Region One USDA Forest Service December 21, 2000 4 pp.

Montana Legislature House Joint Resolution No. 4 1999 Opposing grizzly bears in Selway-Bitterroot

Idaho Legislature house joint Memorial No. 2 1997 Opposing grizzly bears in Selway-Bitterroot

Proctor, M.F. 2003, Landscape use, dispersal, gene flow and population fragmentation of grizzly bears (*Ursus arctos*) in southeast British Columbia, southwest Alberta, and northwestern USA. Ph.D. Dissertation University of Calgary

Proctor, M. F. et al 2012 Population Fragmentation and Inter Ecosystem Movements of Grizzly Bears in Western Canada and Northern United States. *Wildlife Monographs* 180:1-46. Doi: 10.1002/2mon.6.

The Forgotten Grizzlies, High Country News 4 pp. Nov. 14, 2011 by Nathan Rice He quotes USFWS survey of cost of grizzly bears in 2010 by agencies in USA outside Alaska (\$6,294.00 per grizzly bear).

For those who do not know me, I am a Montana native, grew up on ranches in Carter County, and have a M.S. in Fish and Wildlife Management from MSU, Bozeman. I was the first wildlife management biologist on the Rocky Mountain Front working from Helena to Canada and stationed in Choteau. Later I started the first grizzly bear research on the Front and did that for five years. I have been a cattle rancher in south-central Montana and was a general outfitter for 20 years at Wilsall and Sheridan.. I am now retired and do considerable writing and speaking about wildlife. My experience with grizzly bears began in 1963 as an assistant on bear research on the North Fork of the Flathead River and elk research in the Sun River.

1_ / Howard Chrest, retired area wildlife management biologist for FG and FWP at Sheridan read the plan and provided valuable ideas and criticisms. He is a Montana native, worked on brown bear and bald eagle research in Alaska, has a B.S. in wildlife management from the University of Montana and a M.S. from Colorado State University. He began work in southwest Montana in 1964 and was the area wildlife management biologist stationed in Sheridan. He is very familiar with all the mountains and valleys in southwest Montana and understands the problems grizzly bears can cause there.